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VIA ECF

Hon. Robert W. Lehrburger United States Magistrate Judge United States Courthouse 500 Pearl St., Room 1960 New York, NY 10007

(Lehrburger_NYSDChambers@nysd.uscourts.gov)

Orlando A. Centeno, Jr. v. Commissioner of Social Security, 19-

HON, ROBERT W. LEHRBURGER

UNITED STATES MAGISTRATE JUDGE

SO ORDERED:

CV-9008

Dear Judge Lehrburger:

Re:

We represent Plaintiff Orlando A. Centeno, and we respectfully request an extension for filing our motion for judgment on the pleadings in order to have more time to work on and discuss a settlement proposal with opposing counsel, Assistant U.S. Attorney Susan Baird.

Pursuant to the Court's "Order Supplementing Standing Order in Social Security Case" (the "Order") dated February 13, 2020, Plaintiff will be serving his settlement proposal by February 26, 2020. The parties then have 30 days to discuss and try to resolve the case and inform the Court by March 26, 2020 whether such a resolution was reached. Currently, Plaintiff's motion for judgment on the pleadings is also due on March 26th – sixty days after the Record was filed. Plaintiff therefore respectfully requests an extension until April 27, 2020 for filing his motion for judgment on the pleadings in order to see if the case can be resolved.

We have not made any previous requests for adjournment or extension of the matter at issue. Opposing counsel, Assistant U.S. Attorney Susan Baird, consents to this extension.

The proposed revised scheduling order is as follows:

- Settlement resolution due on March 26, 2020
- Plaintiff's Moving Brief due on April 27, 2020

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- Defendant's Opposition Brief (and Cross-Motion) due on June 26, 2020
- Plaintiff's Reply Brief due on July 17, 2020

Respectfully submitted,

/s/ Jack Yoskowitz
Jack Yoskowitz

cc: AUSA Susan Baird, Esq. (by email)

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